

**The ITFS/2.5 GHz Mobile Wireless Engineering & Development Alliance, Inc  
P.O. Box 6060  
Boulder, CO 80306**

June 24, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Ex Parte Submission**

73, 74  
Facilitate the  
Broadband Access,  
Services in the 2150-2162 and 2500  
Bands

WT Docket No. 03-66. Amendment of Parts 1, 21,  
and 101 of the Commission's Rules to  
Provision of Fixed and Mobile  
Educational and Other  
- 2690 MHz

Dear Ms. Dortch:

Yesterday, I, a director of The ITFS/2.5 GHz Mobile Wireless Engineering & Development Alliance, Inc. ("IMWED") met with Uzoma Onyeije, Gregory Vadas, Genevieve Ross, Barrett Brick, Nancy Zaczek, and John Schauble of the Wireless Telecommunications Bureau in connection with the above-listed proceeding.

I reiterated certain of the positions IMWED has taken in pleadings filed in this docket. Specifically, I advocated that the Commission maintain a 15-year maximum lease term for EBS leases, and stated that automatic lease renewals or renewals at the lessee's option beyond 15 years are unacceptable in IMWED's view. I indicated that IMWED has filed a recent supplement to its Petition for Reconsideration regarding this issue, and summarized the contents of that supplement. I pointed out that there is little way for the Commission or the public to know what is in recent EBS leases, as they are no longer routinely filed with the FCC.

I also argued that there are significant advantages to the approach the Commission has taken with respect to making high-power EBS operations a geographically-licensed service rather than a site-licensed service, and urged the Commission to retain those advantages.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this letter is being filed electronically.

Respectfully submitted,

John Schwartz  
Director

cc Uzoma Onyeije  
Gregory Vadas  
Genevieve Ross  
Barrett Brick  
Nancy Zaczek  
John Schauble